



U.S. Department of Justice

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255 Ponce de León Ave. Suite 75
San Juan, Puerto Rico 00917-1919

RE: *Morales Vallenganes v. USPS*
USDC PR Civil No. 97-2459 (GAG)

Dear brother counsel:

Pursuant to the Court's Order at Docket Entry No. 280, the parties are to file on or before this Friday, May 12, 2006, a proposed schedule of the depositions pending in this case.

At the outset we are still waiting for plaintiff's economic and psychiatric experts witnesses reports in order to evaluate the same and make arrangement to engage our own on Defendant's behalf.

We need to have plaintiff's expert report no later than May 20, 2006 so that defendant has time to engage his own experts and be ready to take Plaintiff experts witnesses' deposition no later than June 30, 2006.

In the meantime we propose the following schedule of depositions for plaintiff's factual witnesses during the week of June 19-23, 2006 at the United States Attorney's Office in Hato Rey, Puerto Rico:

<i>Monday, June 19, 2006</i>	<i>9:30 am – 12:00 noon</i> <i>2:00 pm – 5:00 pm</i>	<i>Frank Trinidad</i> <i>Pedro Reyes</i>
<i>Tuesday, June 20, 2006</i>	<i>9:30 am – 12:00 noon</i> <i>2:00 pm – 5:00 pm</i>	<i>Radames Sierra</i> <i>Carmelo Montañez</i>
<i>Wednesday, June 21, 2006</i>	<i>9:30 am – 12:00 noon</i> <i>2:00 pm – 5:00 pm</i>	<i>Jonathan Cruz Class</i> <i>Samuel Carlo</i>
✓ <i>Thursday, June 22, 2006</i>	<i>9:30 am – 12:00 noon</i> <i>2:00 pm – 5:00 pm</i>	<i>Raymond Ruiz</i> <i>Howard Hall</i>
<i>Friday, June 23, 2006</i>	<i>9:30 am – 12:00 noon</i> <i>2:00 pm – 5:00 pm</i>	<i>José Sepulveda</i> <i>John Molina</i> <i>Efigenio Rivera</i> <i>Alberto Ortiz</i>

Mr. Angel Morales' deposition could be taken on July 5, 2006 or July 7, 2006, all day. We also suggest the weeks of July 10, 17, and 24, 2006 to take the depositions. Plaintiff Morales' deposition would always be the last one to be taken.

Please advise as soon as possible, so that we can comply with the Court's Order on or before May 12, 2006.

Cordially yours,

H.S. García
United States Attorney

Fidel A. Sevillano Del Rio
Assistant United States Attorney

cc. Valerie Bacon